

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

No. S7 15 Cr. 536 (PGG)

KALEIL ISAZA TUZMAN,

Defendant.
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DECLARATION OF JILLENE CAHILL

Pursuant to Title 28, United States Code, Section 1746, I, Jillene Cahill, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

Background

1. Since 2010 I have been a realtor with Summit Sotheby's International Realty in Park City, Utah. I act as a realtor for a number of domestic and international clients. I have been a realtor for Kaleil Isaza Tuzman ("Kaleil") since about 2011.

2. I am a member in good standing in the Utah Division of Real Estate.

3. The facts set forth below are based on my personal knowledge and observations.

Kaleil's Purchases in Park City, Utah

4. In 2011, I acted as Kaleil's realtor, and helped him buy a 2- bedroom condominium in the Silver Star community, located in Park City, Utah ("Silver Star Property").

5. Then in 2012, when Kaleil decided to spend more time in Park City, I helped Kaleil purchase a stand-alone, 3-bedroom house located at 1418 Eagle Way, Park City, UT, 84060 ("Eagle Way Property"), in a suburban community.

6. In early 2013, I helped Kaleil with the sale of the Silver Star Property.

7. After the sale of the Silver Star property, Kaleil expressed interest in selling the Eagle Way suburban property, and asked me to look for other properties for him to purchase in more rural, secluded sites in the Park City area.

8. I showed Kaleil multiple properties, including lots for him to build a house on.

9. In the months leading up to the sale of the Eagle Way Property and through the end of 2014, I continued to show Kaleil and his agents properties in the Park City region. I did this at his request, because he wanted to buy a more rural home in the area for his permanent residence.

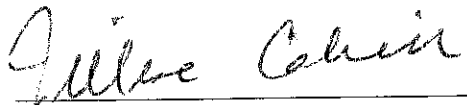
10. Kaleil told me that he wanted to sell the Eagle Way property and use some of the sale proceeds towards his hotel project in Cartagana, Colombia and the other portion to purchase or build a rural home in the Park City area.

11. It was my understanding that Kaleil had started to establish his residency in Park City. He obtained a local PO Box in 2010 or 2011, accepted the Park Meadows Country Club membership that came with the Eagle Way property purchase, registered his car in Park City, and established a corporate entity in Utah (KIT Utah, LLC).

12. Between December 2013 and August 2014, I negotiated on Kaleil's behalf to buy a lot in the rural Deer Crest area of Park City. But the oral offers I made were not accepted by the sellers.

13. During my work with Kaleil, and until the present, he has continued to communicate with me and has expressed to me on many occasions his intention to live and retire in Park City - his favorite place in the world.

Executed on December 8, 2016


Jillene Cahill